

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GIRARD STREET INVESTMENT HOLDINGS LLC,

Plaintiff,

v.

PETRÓLEOS DE VENEZUELA, S.A. *et al.*,

Defendants.

Case No. 23-cv-10772-JSR

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that pursuant to Rules 37 and 69 of the Federal Rules of Civil Procedure (“Rules”) and Local Civil Rule 37.2, upon the accompanying Memorandum of Law in Support of Plaintiff’s Motion to Compel Compliance with post-Judgment Discovery Requests; the Declaration of Michael Baratz in Support of Plaintiff’s Motion to Compel Compliance with post-Judgment Discovery Requests, and the exhibits attached thereto; this Notice; and all prior papers and proceedings herein, Plaintiff Girard Street Investment Holdings, LLC will move this Court before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York, on a date and time to be set by the Court, for an order granting Plaintiff’s motion to compel discovery by Defendant Petróleos de Venezuela, S.A. and non-parties PDV Holding, Inc., Citgo Holding, Inc., and Citgo Petroleum Corp.

Pursuant to the Court’s August 26, 2024 email to counsel for the parties, any cross-motion to quash shall be due on September 5, 2024. There will be no reply.

Dated: August 30, 2024  
New York, NY

Respectfully submitted,

By: /s/ Evan Glassman  
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*Counsel for Plaintiff*  
*Girard Street Investment Holdings LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2024, a true and correct copy of the foregoing Notice of Motion was served via CM/ECF on counsel for Defendant Petróleos de Venezuela, S.A. and via e-mail on the following counsel for PDV Holding, Inc., Citgo Holding, Inc., and Citgo Petroleum Corp.:

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